



Optical Consumer Complaints Service

Forging the Future

Annual Report 2021-22



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Introduction

Shaped by the mood of society, the work carried out by the OCCS necessarily adapts to the challenges faced by patients and optical practices. Indeed, since the beginning of the pandemic, the work and mediations carried out by the OCCS have been impacted by the sharp shock that Covid-19 had on society, through the lens of the relationship between optical practices & consumers. From social distancing to economic uncertainty, the sector, and therefore the OCCS team has effectively adapted to help overcome a series of novel difficulties that came to define the height of the pandemic. As our previous reports and outputs demonstrate, the OCCS developed proven strategies that have supported patients during a particularly tumultuous time.

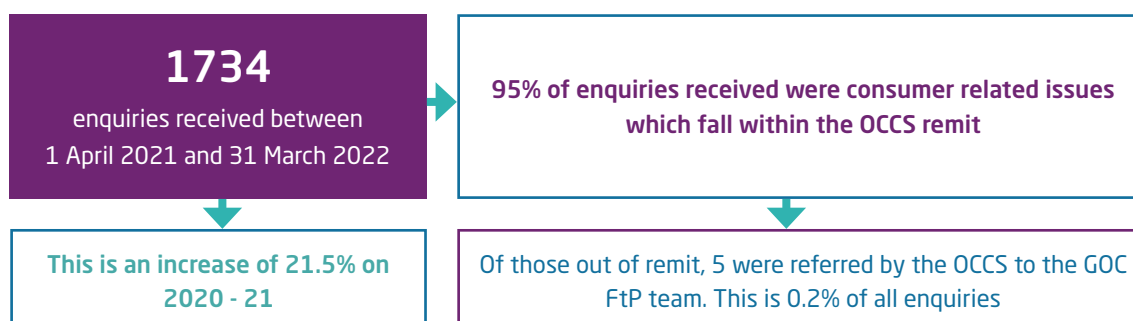
As we emerge into a world that lives with Covid, rather than one which proactively seeks to mitigate its spread, we find ourselves in a world that looks markedly different to the one we lived in prior to 2020. Indeed, the lasting effects of the pandemic are now being felt as the UK economy struggles with rising living costs. Whilst there's no question that these conditions have created the perfect storm, there is also no doubt that the past two years have provided the OCCS with a renewed strength to navigate such choppy waters.

The following annual report summarises the work carried out by the service over the past year, providing a rich amount of insight and data that form the foundations for existing and future trends.

Jennie Jones,
Head of OCCS
Partner at Nockolds Resolution



Executive Summary



Concerns which are initially received by the GOC, and referred to the OCCS as they do not amount to allegations of impaired fitness to practise, amount to 5% of all enquiries (89 in total). This is an 117% increase on 2020-21 (38 referrals).

	2018-19	2019-20	2020-21	2021-22
New Cases into FtP	453	342	314	433
Investigations Opened	269	161	65	107
Referrals to FTFC	37	58	37	32
Erased from GOC Register	9	18	6	4
OCCS Enquiries	1493	1611	1427	1734
Referrals FtP to OCCS	68	59	38	89

The main driver of the overall activity increase is the number of enquiries which require support at a local level (both consumers contacting OCCS for preliminary mediation and referring, back to practices reaching out for support).

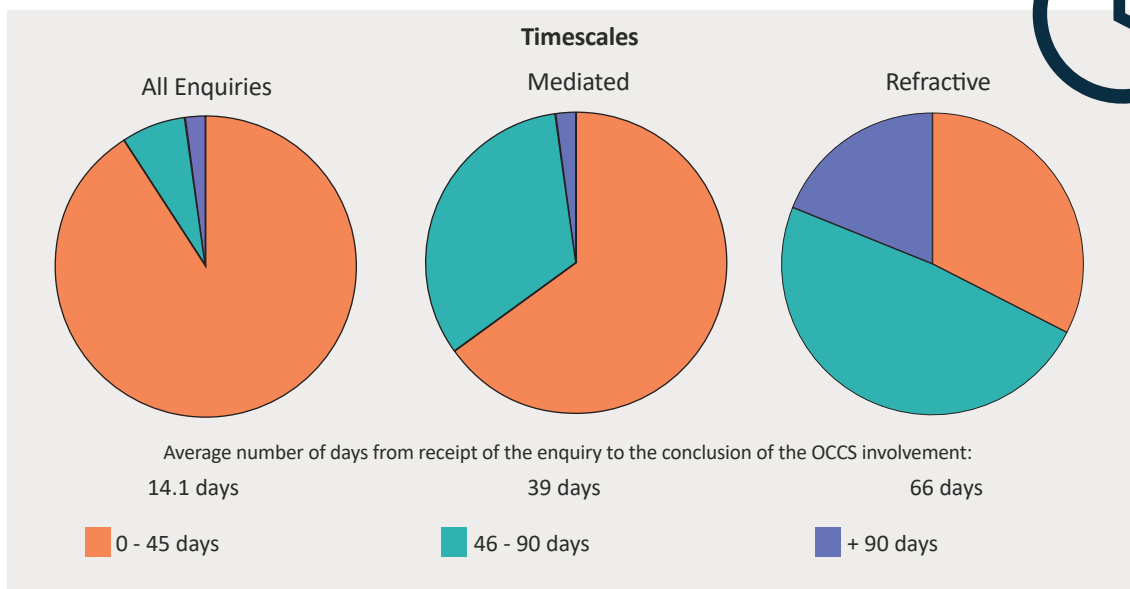
The new collaborative approach to triage has been hugely successful in channelling complaints to the most appropriate body and we thank to GOC FTP team for their excellent execution of this new approach. Fully redacted case synopses are presented from which we can easily define the appropriate channel for a complaint. The process has been consistently uncontentious and easy to secure unanimous support for a course of action. We are of the opinion this is no accident and reflects the meticulous preparation behind these meetings by the GOC triage team along with an energetic and engaging delivery of each session and a high degree of mutual trust.

Outcomes - in remit (%)	2021-22 (%)	Numbers	2020-21	YoY (%)
Practical Advice	4.07	67	37	+81
Preliminary mediation supporting local resolution				
Advice Only	29.40	484	395	+22
Referred To Practice	36.57	602	492	+22
Consumer not to pursue	10.57	174	150	+16
Mediation concluded successfully	14.88	245	225	+8
Mediation unsuccessful	4.50	74	68	+8
Grand Total	100	1646		

Complaint Nature	Count of Complaints Nature (%)	2020-21 (%)	Variation (%)
Goods and services	46	36	10
Customer care	31	36	-5
Other	7	9	-2
Product	7	7	0
Charges	4	7	3
Practice advice	4	3	1
Unknown	1	2	-1



The year-on-year variation reflects the increased activity in the optical sector compared to the 2020-21 pandemic period where the sector operated in 'Red' and 'Amber' conditions. The proportion of complaints relating to the goods and care/service received is consistent with pre-pandemic years.





Objectives and Ambitions

To support the GOC strategy for effective and timely progression of fitness to practice cases to secure PSA objectives through:

Effective low level complaint resolution	
Continuing to proactively develop ways of working that will support increased specificity and sensitivity within the FtP process.	
Share insight and analysis from OCCS activity to support a culture of continuous improvement	
Supporting the professions to manage the long-term impact of the pandemic on practice and consumer relationships	

PROPOSED OBJECTIVES FOR 2022-23

The 2021-22 OCCS strategic objectives are:

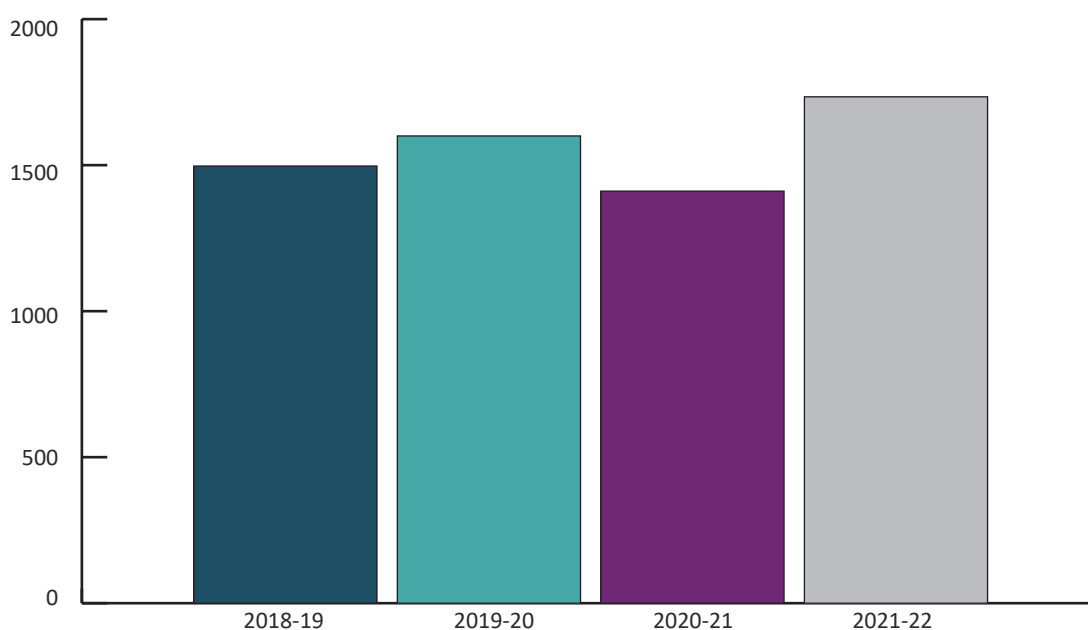
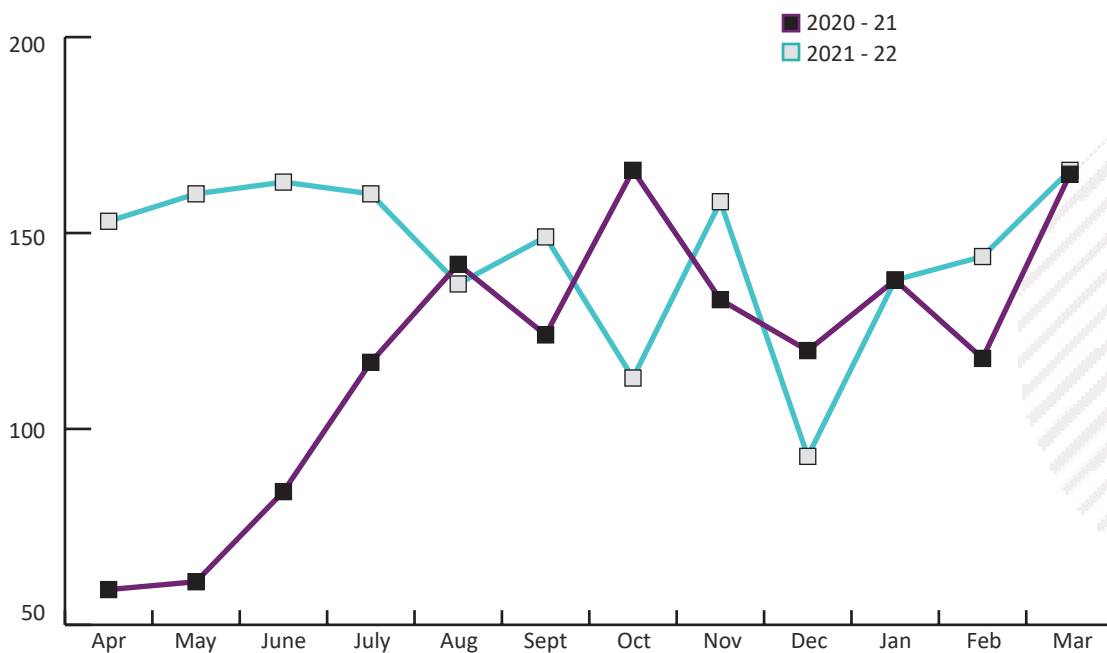
1. Share insight and analysis from OCCS activity to support a culture of continuous improvement
2. Support the GOC to continue to pro-actively develop ways of working that will support specificity and sensitivity within the FtP process, and meet the required performance standards assessed by the PSA, with specific focus on:
 - Work collaboratively with FtP team to refine triage process
 - Ensure integrity of the decision-making process and review with GOC at quarterly meetings
3. Improve accessibility for neuro-diverse OCCS service users by collaborating with external organisations and stakeholders to improve access to, and effectiveness of, mediation for optical consumers and professionals.
4. Actively engage to drive and deliver an effective communication strategy
 - Sector specific-registrants/businesses/professional organisations
 - Health care regulators. Share insights and best practices to support other regulators
 - Input to key reviews of health care regulation to promote optical sector as an exemplar

OCCS Overview

The OCCS received 1,734 complaint enquiries between 1 April 2021 and 31 March 2022 .

This is a 21.5% increase compared with 2020-21, and 8% compared with 2019-20.

During 2021-22, the OCCS team concluded 1,737 matters, with 47 live mediations in progress as at 31 March 2022.



ACCESSING THE OCCS

1. Referrals by the GOC FtP Team

As part of the GOC's remodelling of the FtP triage process and implementation of Acceptance Criteria, the GOC FtP and OCCS teams have worked closely to develop and refine an effective approach which balances the fundamental public protection role of the FtP process with proportionate resolution and a complainant focused process. From the OCCS perspective, there is a key role for the OCCS in supporting proportionate and effective complaint resolution, and the specificity of the FtP process.

Through the remodelled FtP triaged process, proportionate and effective triaging has helped to ensure that concerns are considered and handled within the most appropriate forum. GOC FtP data indicates that of the concerns received by the GOC, 75% do not fall within the Acceptance Criteria and are therefore an investigation is not appropriate. Of those 75%, 27% are referred to the OCCS for complaint mediation and resolution. This has a two fold benefit - with complaints being effectively resolved, and explored under the OCCS contractual and professional obligations to refer any potential allegations of impaired fitness to practise to the GOC FtP team for triage and review.

This also demonstrates the important cross organisational work, and the supportive role of the OCCS in relation to the GOC's statutory function of public protection and maintaining confidence in the professions.

In 2021-22, 89 concerns which were initially received by the GOC, were referred to the OCCS as they do not amount to allegations of impaired fitness to practise. This amounted to 5% of all enquiries (89 in total). This is an 117% increase on 2020-21 (during which 38 direct referrals were received by the OCCS from the GOC FtP process). This demonstrates the effectiveness of the collaborative work with the GOC FtP triage team and the OCCS.

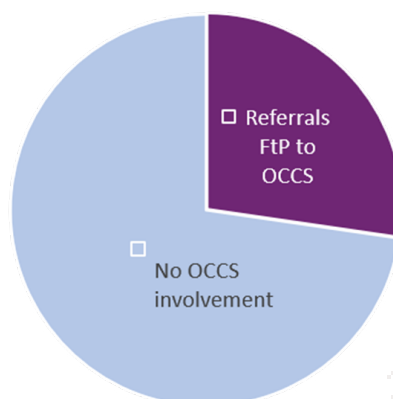
In addition to this combination of direct referrals by the FtP team and those complainants given details of the OCCS, there are also complainants who will self-triage via the GOC or the OCCS websites. There is ongoing collaboration between the OCCS and the GOC team to improve this pathway.

The outcomes of those referrals are detailed in Appendix 2.

2. Direct Access

While 70% of those contacting the OCCS, stated they found out about the OCCS online, via search engines and the online presence, there are other key points of interest when analysing where service users source information about escalating their complaint.

Outcomes of concerns referred to the GOC, where an FtP investigation was not opened (2021-22)



- Instances where a practice has recommended or provided detail for the OCCS to the consumer now account for 4.2% of all enquiries, and this is a 65% increase compared with last year.
- Citizen Advice services continue to be involved in an increasing number of referrals, with 56% more in 2021-22 than in 2020-21.
- The OCCS provides preliminary mediation to support local resolution. In 95% of those interactions, the consumer considers their complaint resolved or they return to the practice for further dialogue, and the matter is resolved. In only 64 instances (5.8% of those preliminary mediation enquiries), did the consumer need to return to the OCCS for further mediation.

3. Remit

95% of enquiries received fell within the consumer complaints mediation remit of the OCCS, with 91 enquiries being signposted to other organisations or falling outside the OCCS remit:

- a. Practice not registered with the GOC or no GOC registrant involvement (36, = to 2020-21)
- b. The complainant was seeking compensation arising from the alleged negligence of the optical professional (19, 18 in 2020-21)
- c. Complaint included allegations that potentially could amount to impaired fitness to practise (5, = to 2020-21)

A critical aspect of the OCCS role is ensuring that any complaint circumstance involving potential allegations of impaired fitness to practice received by the OCCS, are referred to the GOC in order to protect the public. While these events are few and far between, it is essential that this monitoring and safeguarding aspect of our triage and mediation management is effective. The OCCS team have a good understanding of the issues and concerns which may amount to an impaired fitness to practise. This is reinforced through training and interaction with the GOC FtP team so both teams have a detailed working knowledge of how the roles differ and support each other to deliver timely and effective resolution.

In 2021-22, the OCCS referred 5 matters to the GOC FtP team as the complaint involved potential allegations of impaired fitness to practice, or the complainant considered the matter appropriate for GOC referral. Three involved behaviour and attitude of a GOC registrant, and two related to clinical diagnoses.

- d. Miscellaneous enquiries - The remaining 31 (an increase from 19 in 2020-21) included:
 - A non-consumer related dispute between a practice and a member of the public
 - Employer/employee dispute
 - General enquiries on regulation, education and training of optical professionals
 - Historic issues (more than 12 months since the final response to a complaint or the last interaction between the practice and the consumer)
 - General enquiry regarding the award of public sector contracts in the optical sector.

OUTCOMES

The OCCS has concluded 1646 matters which were in remit, between 1 April 2021 and 31 March 2022.

Outcomes - in remit (%)	2021-22 (%)	Numbers	2020-21	YoY (%)
Practical advice	4.07	67	37	+81
Preliminary mediation supporting local resolution				
Advice only	29.40	484	395	+22
Referred to Practice	36.57	602	492	+22
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PRACTICE ADVICE

OCCS receive contacts from optical practices seeking assistance and support with local resolution of complaints. In 2021-22, the OCCS saw an 81% increase in practice contacts, increasing from 37 to 67 year on year. The OCCS encourages practices to contact the service for early advice and guidance, which supports early local resolution.

Qualitative analysis suggests this increase may be linked to:

- Profile raising of the OCCS so there is greater awareness of the service and also the option of practices seeking advice
- Increased confidence by the sector in the OCCS, and also to pro-actively and positively handle complaints
- The increased level of tension in the consumer relationship due to the pandemic, transitioning out of the pandemic, the impact of the cost-of-living crisis and ongoing wider societal anxiety. These have all contributed to a lower acceptance criteria benchmark for complaints being raised and a heightened level of emotion within the complaints. Practices are seeking support in handling and resolving these matters locally.



PRELIMINARY MEDIATION SUPPORTING LOCAL RESOLUTION


The OCCS team combines optical sector experience with mediation resolution skills to provide effective support and guidance at the point of initial contact by the consumer. If the complaint has exhausted local resolution, it will progress into full mediation.

In 66% of contacts within remit, the complaint is still sitting in local resolution i.e., with the practice.

The OCCS will explore with the consumer:

- The details of the complaint
- What has been done to try to resolve the matter so far
- If no contact has been made with the practice, how the complaint should be presented and the focus needed to help aid swift and local resolution
- Why the input by the practice so far has not resolved the complaint
- The basis, root cause and desired outcome for the complaint to assist the consumer in formulating and articulating a reasonable and focused complaint in their interaction with the practice.

95% of these interactions are successful and the complaint does not return to the OCCS.



In 2021-22, the OCCS saw a 22% year on year increase in the number of complaints assisted at this stage. This accounted for a significant proportion of the increased activity. This is to be expected given the increase in activity across the optical sector in 2021-22, compared with 2020-21 when tighter restrictions were in place across all four nations and the pandemic impacted on practice capacity.

The OCCS continues to analyse these complaints to share real time updates and guidance for practices to access during the year, to help minimise recurrence and pro-actively adjust ways of working or team focus.

CONSUMER NOT TO PURSUE

In 10% of enquiries within the OCCS remit, the consumer opts not to proceed with mediation, even when local resolution is exhausted. This is consistent with previous years.

There are a number of reasons for this. The consumer may:

1. Decide they want an investigative, adjudication so may consider legal proceedings
2. Fail to engage further and do not return the Agreement to Mediate document
3. Consider that they do not wish to pursue the complaint further, but that their issues have been logged with the OCCS.

The OCCS does explore the reasoning behind any proposed formal escalation (such as legal proceedings or contact with the GOC) to ensure the consumer has made a fully informed decision not to try mediation over any formal adjudication.

MEDIATIONS

Where local resolution has been exhausted, the OCCS will engage with the consumer and the practice to mediate the complaint.

The OCCS conducted 8% more mediations in 2021-22 compared with 2020-21, with a consistent year on year resolution rate.

The assigned OCCS Resolution Manager will mediate between the consumer and the practice to assist in finding a resolution acceptable to both parties.

There is little variation in the outcomes or the need for full mediation in different types of complaint, save those complaints relating to charges and offers are more likely to be resolved at an earlier stage, without the need for full mediation.

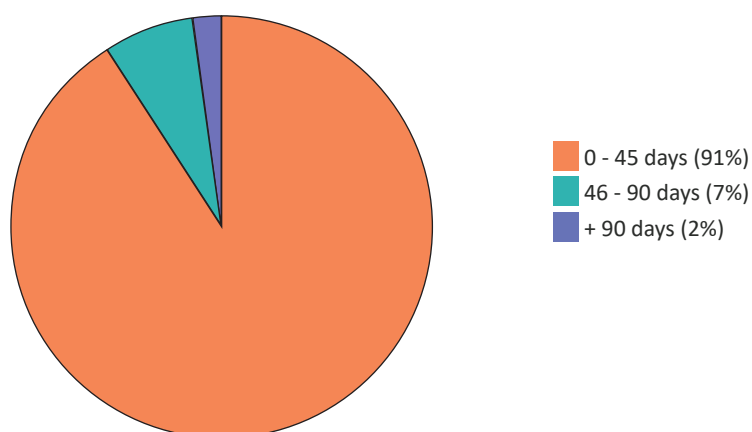
RESOLUTIONS

The resolutions mediated within the OCCS process range from:

- Supporting the consumer to return to the practice for a further consultation, adjustment or replacement product
- Partial or full refunds
- Apologies
- Explanations and counselling
- Supplementary and complimentary product supplied
- NHS voucher reinstatement.

TIMESCALES

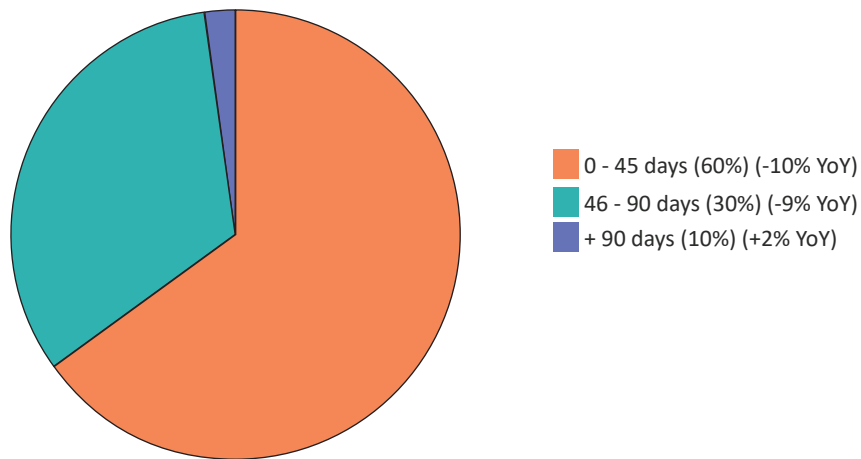
All enquiries



Average 14.1 days from receipt of the enquiry to the conclusion of the OCCS involvement (+1.7 days on

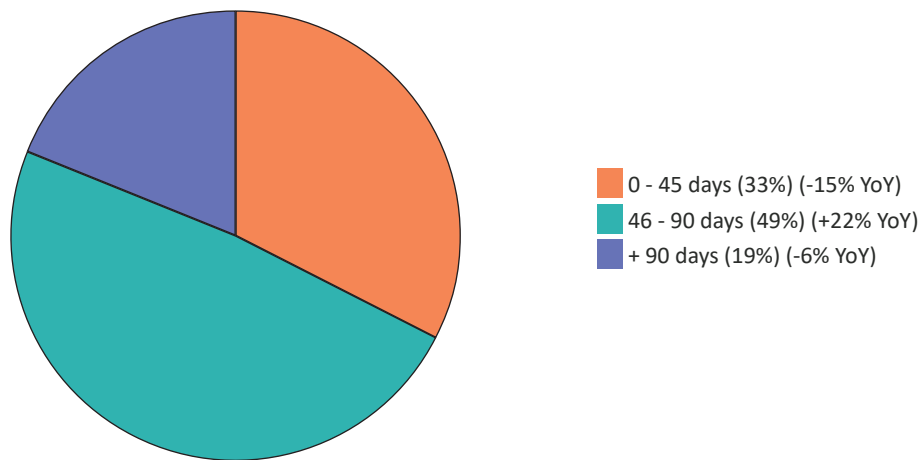
2020-21).

Mediated Complaints



Average 39 days from date of receipt of Agreement to Mediate to conclusion.

Refractive*



Average 66 days from date of receipt of Agreement to Mediate to conclusion


*Due to the nature of consumer complaints relating to refractive surgery, these can take longer to mediate. In previous years, the report has detailed these timescales so these are provided once again for reference.



Feedback

Reviewing the qualitative feedback received from users, it is evident that the service continues to be well-received. Specifically, the feedback submitted over the last year revealed how users were pleased with the OCCS, even when they may not have got the resolution they had hoped for. Specifically, feedback from users suggested that they would be prepared to use the OCCS again, but were unlikely to use the respective practice involved in the dispute again. This conclusion has been reached by examining how highly people marked the question of “would use the service again” when compared with “would use the practice again”. In many cases, respondents did not leave lengthy replies which went into detail about their dispute and the way in which it was handled. Indeed, it should be noted that feedback fatigue remains a challenge for the service, with a lower than desirable volume being submitted over the course of 2021. Whilst measures have been undertaken to make the feedback process as simple and as accessible as possible, the OCCS remains committed to identifying ways to enhance the overall amount of feedback submitted.

SERVICE ISSUES



During 2021, the OCCS received one formal complaint which was managed in accordance with the OCCS Complaint Policy. This related to the scope of mediation, and a frustration that the practice could not be compelled to respond within a set timescale and required to meet the complainant’s requested resolution. The OCCS also received a concern from a member of the public who supports patients who are dissatisfied with the care provided or the outcome achieved from refractive surgery. The OCCS responded in full to the points raised, in so far as they related to the role of the OCCS.




Complaint Insight

Nature of Complaint

Complaint Nature	Count of Complaints Nature (%)	2020-21 (%)	Variation (%)
Goods and services	46	36	10
Customer care	31	36	-5
Other	7	9	-2
Product	7	7	0
Charges	4	7	-3
Practice advice	4	3	1
Unknown	1	2	-1


BUSINESS TYPE



Enquiries received by the OCCS continue to reflect the market share between independently owned practices and those within a Multiple.

There is very little variation in the nature of complaints referred to the OCCS between Independent practices and those within a multiple, franchise or JVP group.

Count of Complaint Nature	Independent (%)	Multiple (%)
Goods and services	48.02	50.16
Customer care	32.83	33.19
Other	2.13	2.83
Product	4.86	8.06
Charges	5.78	3.35
Practice advice	6.08	1.99
Unknown	0.30	0.42



Count of Outcome	Independent (%)	Multiple (%)	NHS (%)	Other (%)	Unknown (%)
Practical Advice	6.42	2.09	0	0	6.50
Out of Remit	3.36	3.77	100	56.60	3
Advice Only	20.18	26.70	0	24.53	37.50
Referred to Practice	39.14	36.44	0	13.21	29.75
Client Not to Pursue	5.81	7.64	0	0	20.50
Mediation concluded successfully	18.04	18.12	0	3.77	2.75
Mediation Unsuccessful	7.03	5.24	0	1.89	0

The outcomes of OCCS interaction are also consistent across the sector. As expected, the OCCS does receive more practice enquiries from the independently owned practices. Practice who are part of a group or a multiple will have access to support and guidance within their group. The OCCS also continues to work closely with independent stakeholders to raise awareness of the service and to share insight to support quality improvement and support local resolution.

REGION

Northern Ireland

% of enquiries: 0.70%
v national statistics: -2%

Wales

% of enquiries: 4.39%
v national statistics: =

Scotland

% of enquiries: 6.94%
v national statistics: -2%

England

% of enquiries: 87.96%
v national statistics: +3%

CONSUMER ED&I

Data responses suggest the ED&I data for 2021-22 is consistent with previous OCCS years, save for an increase in consumers who consider themselves to have a disability. This has increased from 18% to 21%, and now closer to the national statistics of the general population.

Full ED&I analysis is contained in Appendix 3.

NATURE OF COMPLAINTS

Appendix 1 contains a detailed breakdown of the complaint categories received during 2021-22 and compared with 2020-21.

As in previous years, the OCCS have undertaken an analysis of the complaint issues, how categories of complaint are resolved and the qualitative insight gathered via the complaint mediations.

Analysis - consumer cites eye examination or prescription error as primary concern

	Return to practice with advice	Out of Remit	Advice only	Mediation successful	Mediation	Live	Total
Quality of Examination	31	7	24	11	10	1	84
Optometrist customer care	17	6	7	5	2		37
Rx Error	86	24	43	28	8	4	193
Total	134	37	74	44	20	5	314

Analysis of complaints in this category indicated that there are some covid legacy issues coming through to the OCCS. As requested at Council last year, the OCCS added a category in 2021-22 regarding consumers who considered the prescription to be incorrect. These could then be considered in contrast to the complaints which the consumer considered to be related to the dispensing of spectacles or lenses.

We noted a relatively high number of unsuccessful mediation under the category of quality of eye examination which seems to be driven by some practices being very defensive in this area. We will monitor this category with interest in the coming year.

Analysis - consumer cites clinical diagnosis as primary concern

	Return to practice with advice	Out of Remit	Advice only	Mediation successful	Mediation	Live	Total
Cataract	8	3	5	3	1	2	22
Glaucoma	1		4	2		1	8
Ret Det/PVD	4		3				7
ARMD	2	2	5			1	10
Misc.	6	2	3	5			16
Total	21	7	20	10	1	4	63

In the 2021-22 year, the OCCS saw a significant statistical increase in complaints relating to cataracts. In most complaints, the consumer was supported by the OCCS working with the practice or directly to ensure the consumer had an explanation of decision or the referral criteria/process.

In the 2021-22 year, the OCCS saw a significant statistical increase in diagnosis driven complaints (up from 46 to 63) reflecting increased activity returning to the sector and increased confidence in elderly members of society to return to their opticians. The largest YoY increase related to cataract where concerns increased from 8 to 22. No clinical concerns were noted in these cataract cases - the issues were primarily that of communication and patient understanding of referral criteria. As such in most complaints we were able to address the concerns swiftly in early phases of our process. Where required, the consumer was supported by the OCCS working with the practice or directly to ensure the consumer had an explanation of decision or the referral criteria/process. It is, however, a salient reminder to registrants of the need to ensure patients understand their condition and to keep good records of advice given.

Overall, in this category, the OCCS saw the majority of these complaints referred to practice with preliminary mediation, advice and local resolution support. This reflects the increasing capability and confidence of Resolution Manager in this arena, and the impact of the GOC Acceptance Criteria concerning single clinical issues.

The complaints falling outside of remit were a combination of consumers wanting to refer the matter to the GOC or to be adamant they wanted to pursue legal avenues for redress. These were signposted accordingly.

Analysis - complaints involving refractive surgery

	Return to provider with advice	Out of Remit	Client chose not to pursue	Advice only	Fully/partially successful mediation	Unsuccessful mediation	Live	Total
Charges & Refunds	2	2		2	2	1		9
Outcome of Surgery	18	7	7	25	17	9	6	89
Aftercare	3	1		1	1	1		7
Complaint Management	3	1	1	8		1		14
Attitudinal				2				2
Inappropriate selling	1				1	1		3
Change of mind	2			1			1	4
Misc.	1		1	1				2
	30	11	9	40	20	13	7	130

In 2021-22, the OCCS saw an increase of 30% YoY in complaints relating to refractive surgery driven by uplift in activity in this specialist clinical area as we emerged from COVID constraints.

Frustratingly, this includes 4 enquiries relating to providers of refractive surgery who are not GOC registrants and therefore fall outside the remit of the OCCS.

The effectiveness of mediation in these complaints has dipped slightly year on year -20 successful vs 13 unsuccessful (30 vs 9 last year). Last year's higher successful mediations were aided by the simple low hanging fruit of complaints relating to deposit returns for customers during the pandemic.

Mediation success rates are lower in elective surgery cases than the 'core optical' cases reflecting the increased complexity of such complaints. Many cases relate to a disappointment in the refractive outcome and we would encourage any potential patients to be vigilant and cognisant of the detailed consent process in the area of elective surgery.

The OCCS has seen an increase in the proportion of cases supported at the local resolution stage with advice and preliminary mediation along with increased signposting to other avenues when mediation was deemed inappropriate.

In 2022-23, the categories relating to refractive surgery complaints will be updated to ensure the terminology used reflects the nature of the issues and complaints raised e.g., outcome of laser eye surgery, will be retitled outcome of refractive surgery.



OVERALL INSIGHTS

Price Sensitivity

In the latter half of the year, anecdotal analysis indicates that the OCCS has seen the impact of financial pressures starting to flow through into optical complaints. This takes many different forms but includes: increase in pricing related issues and practices perceiving complaints to be related to consumer regret. This is likely to increase further in 2022-23 as the cost-of-living prices increases the pressures on household and practice finances.

Communication in Clinical Complaints

The root cause and primary issue in clinical related complaints has consistently been communication and misaligned understanding of the risk, need for treatment or referral and counselling consumers to aid understanding and the clinical progression of the condition. This once again demonstrates the need and benefits of developing professional confidence and expertise in this area which minimises unnecessary patient anxiety and professional resilience.

Provision of Prescription

In previous annual reports, we have highlighted a statistical increase in complaints relating to the provision of a prescription by the practice. The OCCS has undertaken some comms insight led work on this. Stakeholder engagement has also referenced this issue, including in feedback reports with multiples and professional bodies. In 2021-22, the OCCS saw a decrease in the number and proportion of complaints relating to this issue, reducing from 48 in 2020-21 to 28 in 2021-22.



Domiciliary

Given the vulnerability of consumers in the domiciliary sector, the OCCS has always analysed complaints arising in this area to monitor how those consumers can access support and also trends in complaints arising.

In recent years, we have seen an ongoing commitment, with positive impact by larger providers to improve consent procedures, capacity assessments and complaint handling by with consumers and where appropriate, their families or representatives.

There is oversight in this area in terms of NHS performance controls and of course, GOC practise standards. The OCCS also has sight of the private consumer interactions which occur in this part of the sector.

This is an area of practice which comes with an increased risk around patient capacity balancing respecting a patient's right to make their own independent decisions with protection, obtaining valid and proper consent and appropriate prescribing and dispensing decisions.

Over the last 12 months, the OCCS has seen an emerging anecdotal trend, which is supported by the statistical analysis, of increasing complaints involving smaller providers of domiciliary eye care.

The numbers of complaints referred to the OCCS remain low (38) but the increase from 2020-21 (18) is significant. The impact of the pandemic and restrictions during 2020-21 may be a factor, but the OCCS continues to monitor this area.



The complaint issues can be categorised as follows:

- Concerns around consent being obtained for an eye examination by a provider who is not the consumer's usual optometrist
- Concerns and inconsistency around the assessing capacity, and then it's relevance and data protection within complaint handling
- Complaints where the consumer or their family considers the change in prescription or the visual acuity achieved with the dispensed spectacles does not justify or explain the recommended purchase. These issues may be addressed with reference to records which note sufficient detail of findings of the eye examination and refraction. Where this information is not recorded or is minimal, it is difficult to justify or reason the clinical judgment and recommendations when faced with a consumer who considers they have been inappropriately or unnecessarily advised to purchase spectacles or a particular type of lense.

While GOC registrants are involved and accountable for the care they deliver and standards of practise, some providers themselves are not GOC registrants and so currently fall outside the GOC's standards of practise for business registrants. The OCCS will continue to monitor and analyse so insight can feed into the Call for Evidence and legislative reform.





Impact of the OCCS

Whilst it was perhaps more vital than ever during the pandemic, regular engagement was, and remains, a high priority for the OCCS. From social media campaigns to internal communications, our team has been highly active throughout 2022, ensuring that the public and professionals are fully aware of the latest initiatives. From enhanced accessibility to updated toolkits, the following summary provides an overview of the outreach and work the OCCS has conducted so far this year:


CET TO CPD:

During 2021/22 COVID constrained our activity to deliver live CET events. Despite this we delivered 18 CET events, returning to our preferred live event modality in September 2021 and delivering approximately half of our programme live during the year. We also mitigated our constrained programme of CET activity by delivering a number of high-profile large capacity events peaking at 500 delegates for an online session with Optician magazine subscribers in April 2021.

We are delighted that interest in live events has been resurgent this year

As the GOC transform CET to CPD this year we have already started to work more expansively than previous years. The new CPD approach is welcomed by the OCCS and is enabling the team to be nimbler in our approach for CPD clients and also tailor our content precisely and at pace.

MACULAR SPECTACULAR:



Following the publication of last year's OCCS Annual Report, the Macular Spectacular Initiative is making exciting progress. Born out of insights dating back to 2018, the initiative is focused on the communication and management of macular conditions in primary care. Designed to raise practitioner awareness, increase information sharing, and upskill professionals, Macula Spectacular has earned the support of Topcon, a manufacturer of optical equipment for ophthalmology with a significant reach. In addition to bringing greater visibility to the initiative, Topcon will also be delivering a series of co-branded CPD events across the country to their network.

Moreover, we are delighted to have commenced two strategic partnerships to amplify our volume and capacity to upstream complaint insights in three key areas

- a. Working with Topcon to increase reach in the delivery of our AMD CPD session
- b. Co creating with Cooper vision a CPD session on the exciting developments in Myopia Management using OCCS insights to help registrants focus on the critical conversations that will underpin their success in myopia management provision in the future.

The OCCS would be delighted to work with other stakeholders to develop creative approaches to new CPD design and delivery in the future and ask that any interested parties contact us to discuss this further.



OCCS Newsletters:

The OCCS has remained committed to producing a series of timely newsletters. Updating readers on the latest changes in regulation as well as providing rich insights into emerging trends, the newsletters are designed to keep professionals up to the minute. Linking to blogs produced by the OCCS as well as pieces produced by industry thought-leaders, the newsletters are curated to be as valuable as they are engaging.

ABDO Articles:

Providing commentary and insight to the industry at large, the OCCS has been published by the Association of British Dispensing Opticians (ABDO) in 2022. Exploring current issues, the articles largely focus on how opticians can best respond to the novel challenges that have been brought about as a consequence of the pandemic.



‘Had the audience enthralled and there were audible gasps as the story unfolded! ‘



Customer Service Strategy

ACCESS & ACCESSIBILITY

ED&I Toolkit

Committed to providing our team with all of the knowledge and skills they need to do their work effectively, the OCCS updated its internal EDI toolkit earlier this year. One update was to include more information on working with the visually impaired. This update was carried out in collaboration with Visualise Training and Consultancy, a specialist consultancy which ensured that the resources our teams refer to are as up to date and effective as possible.

Another update to the toolkit included a piece on defining unreasonable behaviour. This update was made in light of growing difficulties with clients who resorted to challenging behaviour as a result of the restrictions imposed on services by the pandemic.

Looking forward, future updates to the EDI toolkit will explore how the OCCS and ADR more generally can improve inclusivity and accessibility to neurodiverse individuals. In order to carry this work out successfully, collaboration will be performed with relevant experts and existing connections in the Healthcare Regulators EDI forum.

Altogether, the toolkit has become an even greater resource for the team this year and will continue to grow in efficacy throughout 2022.

Neuro-diversity

As part of an ongoing commitment to providing a more inclusive and accessible service to neurodiverse individuals, the OCCS team undertook training with the National Autistic Society to develop greater insight and a better understanding of how to adapt approaches, communication and interactions within OCCS mediations. This has informed a literature and communication review to improve the accessibility of the information provided.

Unconscious Bias Training

The Nockolds Resolution team has undertaken training in unconscious bias to increase our awareness and to work on strategies to minimise the impact of our individual and collective bias when mediating.

Ultimately, the OCCS has been highly active and involved in a wide range of projects so far this year and will continue to be similarly engaged throughout the remainder of 2022.

Regulatory Reform

The OCCS continues to feed insight into formal and informal consultations on regulatory reform and the importance of proportionate complaint resolution and insight driven quality improvement.



Legislative reform in optics

The OCCS and Nockolds Resolution have provided insight and information relating to:

- Illegal practice
- Business regulation

The OCCS are vigilant within complaint mediations to identify and flag any perceived inappropriate use of protected titles to protect consumers and trust and confidence in regulated eye healthcare professionals.





Conclusion

Altogether, the OCCS remains an organisation that produces positive outcomes whilst remaining focussed on operational improvement. As this annual report illustrates, the service has evolved in the face of unprecedented challenges and gone to significant lengths to prioritise accessibility. Well-prepared for all of the challenges that are produced by an uncertain economy, the OCCS remains committed to supporting resolutions at all stages of disputes. It is also imperative that future qualitative data is considered to be as significant, if not more significant, than quantitative data. The reason for this has to do with the way that comparisons to the height of the pandemic make it difficult to form meaningful measures of success or failure. Indeed, the pandemic provided much low hanging fruit that makes it easy to assume there were greater orders of success when looking at things from a distance. Instead, attention must be paid to case studies and feedback when establishing the challenges and results faced by the OCCS. Confident that we have the skills and ability to adapt, the OCCS looks forward to the challenges ahead with well-deserved optimism.




Appendices


APPENDIX 1: OCCS DATA

Nature of Complaints including sub categories


	Complaint Nature	2020-21
Goods & Service	796	
Cataract	4	2
Concerns with the examination	84	43
Dispense of varifocal	84	60
Dispensing	162	106
Error with prescription	222	146
Eye Test	2	
Missed diagnosis	66	38
Outcome of Laser eye surgery	89	67
Prescription prescribed in one practice and dispensed in another	66	34
Reglaze - issue with consumers own frame	16	18
Unknown	1	3
Customer Care	540	
After care	16	13
Alleged inappropriate selling	28	26
Attitude	106	96
Complaint handling	66	81
Consumer change of mind	25	27
Delay in supply	98	99
Excluded from store	13	6
Failure to deal with concerns/complaint	60	26
Laser surgery - complaint handling	3	11
NHS Voucher query	37	20
No prescription provided	28	48
Non-qualified staff issues	4	1
Optom customer care	43	46



Pupillary Distance - entitlement	13	5
Other	128	
Miscellaneous	122	120
Practitioner query	2	3
Unknown	4	6
Product	117	
Contact lenses	5	4
Product – frames	79	83
Product - lens coating	23	17
Product - lenses	10	4
Charges	73	
Charges and offer	71	93
Unknown	2	3
Practice Advice	66	
Unknown	66	45
Unknown	14	
Unknown	14	24
Grand Total	1734	1424



Business Type




Complaint Nature			
	Independent (%)	Multiple (%)	Grand Total
Charges	5.78	3.35	3.97
Customer Care	32.83	33.19	33.10
Goods & Service	48.02	50.16	49.61
Other	2.13	2.83	2.65
Practice Advice	6.08	1.99	3.04
Product	4.86	8.06	7.24
Unknown	0.30	0.42	0.39



Source

Source	Source (%)
Charity	0.06%
Citizens Advice Bureau	2.25%
Magazine	0.06%
News/Press	0.17%
Other	5.94%
Previous ref to practice/Advice only	3.69%
Professional Event	3.29%
Referral	3.86%
Referral GOC	4.90%
Referral Other Practice	0.29%
Referral Practice	5.54%
Unknown	0.40%
Website	69.55%





APPENDIX 2: GOC RELATED REFERRALS

	Outcome
Out Of Remit	4
Referred To Practice - Local Resolution	30
Advice Only	8
Client Not to Pursue	18
Partial resolution	1
Resolved at early stage	5
Resolved on mediation	12
Mediation unsuccessful	6
-	4



APPENDIX 3: EDI


Age Range	Age Range (%) 2021-22	Age Range (%) 2020-21
16-24	99 (7.70%)	7.05%
25-34	320 (24.90%)	23.81%
35-44	276 (21.48%)	20.85%
45-54	303 (23.58%)	25.22%
55-64	220 (17.12%)	16.55%
65 Or Over	67 (5.21%)	6.47%
NULL	111	

Gender	Gender (%) 2021-22	Gender (%) 2020-21	National Stats
Female	940 (72.98%)	73.17%	50.6
Male	348 (27.02%)	26.83%	49.4
NULL	108		

Disability	Disability (%) 2021-22	Disability (%) 2020-21	Survey Data
No	970 (81.51%)	86.49%	78.80
NULL	206		
Yes	220 (18.49%)	13.51%	21.20

Increase in service user who consider themselves to have a disability


Ethnicity	Ethnicity (%) 2021-22	Ethnicity (%) 2020-21	2011 census most reliable data (%)
Asian	40 (3.3%)	1.90%	7
Black	4 (0.3%)	0.40%	3
Mixed	26 (2.1%)	2.20%	2
NULL	167		
Other	18 (1.5%)	1.90%	1
White	1141 (92.8%)	93.40%	87



Sexual Orientation	Sexual Orientation (%) 2021-22	Sexual Orientation (%) 2020-21	Sexual Orientation National Statistics (%) 2018
Bisexual	18 (1.6%)	1.16%	-
Gay	43 (3.9%)	3.74%	2.2%
Heterosexual	1004 (90.5%)	92.81%	94.6%
NULL	286		
Other	45 (4.1%)	2.29%	3.2%

Marital status	Marital Status (%) 2021-22	Marital Status (%) 2020-21	2019 Marital Status Data
Civil Partnership	47 (4.1%)	4.72%	-
Divorced	76 (6.6%)	7.93%	6.61
Married	470 (40.9%)	45.09%	40.7
NULL	247		
Prefer Not To Say	63 (5.5%)	3.91%	0.14
Separated	14 (1.2%)	1.12%	-
Single	453 (39.4%)	34.73%	47.5
Widowed	26 (2.3%)	2.51%	4.98

Religion	Religion (%) 2021-22	Religion (%) 2020-21	2018 National Data Estimate (%)
Buddhist	5 (0.5%)	0.71%	0.4
Christian	467 (43.8%)	48.03%	51
Hindu	5 (0.5%)	0.59%	1.6
Jewish	9 (0.8%)	0.55%	0.5
Muslim	23 (2.2%)	0.63%	5.4
None	430 (40.3%)	40.10%	39
NULL	329		
Other	45 (4.2%)	4.03%	1.6
Prefer Not To Say	76 (7.1%)	5.03%	-
Sikh	7 (0.7%)	0.34%	0.6






Region	Region (%) 2021-22	Region (%) 2020-21	v National Statistics
England	1001	95.26%	+3%
Scotland	79	2.35%	+2%
Wales	50	1.93%	=
Northern Ireland	8	0.46%	-2%
Other	12	-	
NULL	246		






APPENDIX 4: 2020-23 STRATEGIC ACTIVITY

- Development of the OCCS to ensure it delivers world class complaint resolution
- Support the GOC in delivering the corporate and strategic plans for 2020-2027;
- The challenges faced by the sector such as an ageing population and the increased provision of ever more complex eyecare in primary settings; and
- Resource available to the OCCS, which could be linked to resource efficiencies within the GOC achieved by widening the use of the OCCS (which offers more agility and potential for economies of scale).
- Leverage the benefits FtP remodelling by delivering trusted complaint resolution in optics:
- Work collaboratively with the FtP team to extract value from introduction of Acceptance Criteria and pro-actively drive low-level complaints out of triage to OCCS for resolution;
- Work collaboratively with FtP to ensure PSA objectives are successfully delivered;
- Work collaboratively with the GOC to explore how mediation can support FtP as set outlined in the Government White Paper – Promoting Professionalism, Reforming Regulation July 2019. Given the working relationship built over the past five years, the GOC and the OCCS have the opportunity to progress the already ground-breaking work in complaint mediation in regulated healthcare to lead the regulatory field.
- Deliver insight sharing activity which provides Upstreaming and supports an embedded Learning Culture
- Deliver student presentations at optometry universities and dispensing colleges to drive student awareness of OCCS, greater understanding of professionalism and expectations of consumers, the public and their regulator, and effective complaint management;
- Continue to use our CET proposition to carry positive message of change in FtP to registrants, and to incorporate learnings from FtP cases and analysis of complaints referred into both organisations;
- Increased use of online tools and medium to widen reach to members of the optical professions and share ‘bite size’ learnings and insight.
- Continually develop and improve the OCCS effectiveness, accessibility and inclusivity (Equality, Diversity and Inclusion)
- Continue to evaluate and develop initiatives to improve the accessibility of the OCCS for all consumers, and to ensure that all consumers have a clear understanding of what they can expect from their eyecare provider to assess ‘what good looks like’.
- Effective Consumer and Public Protection
- Work collaboratively with the GOC to develop greater interaction and risk management within the overall regulation of eyecare namely, NHS via performers list, employer/practice links and other bodies to ensure the public are not put at risk by a lack of knowledge or sharing of a registrant’s impairment.
- Work collaboratively to support the implementation of a reformed approach to business regulation:
- In recent years, the OCCS has seen an increase in complaints referred to the service where the



business providing eye care services and supplying spectacles/lenses was not registered with the GOC and no individual registrant was involved in the complaint. Many consumers expect all suppliers of eyecare and optical products to be regulated by the GOC. The knowledge gained, and evidence collated by the OCCS will be shared with the GOC to inform the GOC's proposed strategic aim to seek reform of the Opticians Act and business regulation. As the GOC progresses a strategic aim in this area, the OCCS will continue to work collaboratively with the GOC, to support the regulator in delivering a comprehensive, simpler and more effective system of business regulation.

- Work collaboratively with the GOC to review the remit of the OCCS given the reform of business regulation, activity in niche areas of the sector such as refractive surgery and the cross-border issues arising from online supply and sales which may expand with improving technology and the potential to increase remote sight tests and refractions.
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